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5 Attorney for Plaintiff,
ADAM TIMOTHY GROOM

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

11 || ADAM TIMOTHY GROOM,

12 || Plaintiff,

13 || v.

14 | COMMISSIONER OF SOCIAL SECURITY,

15 || Defendant.

Case No. 2:23-cv-00174-AC

**STIPULATION AND PROPOSED ORDER
FOR MODIFICATION OF SCHEDULING
ORDER [ECF No. 5]**

[ECF No. 14]

16 Subject to the approval and any further orders of the Court, the parties, by and through
17 counsel of record, stipulate and agree that the scheduling order for Social Security cases in this
18 action [ECF No. 5] should be modified. Plaintiff's time to move for summary judgment should be
19 extended from 8/14/2023 to 8/21/2023, all other deadlines to be determined by reference to the
20 Court's scheduling order, and that good cause supports the extension of time.

21 This is Plaintiff's third request for modification of the scheduling order. Good cause
22 supporting the extension of the filing deadline includes Plaintiff's counsel has been unable to
23 complete Plaintiff's motion for summary judgment to the professional standards of the Court, as
24 of the current deadline, despite diligence due to unforeseeable intervening events, including aa
25 medical emergency of a close associate with whom he works, and requires this short extension to
26 finalize Plaintiff's motion for summary judgment on the administrative record.

27 This request is made jointly in good faith, without dilatory motive, and not for purposes of
28 undue delay or to prejudice the interest of any party.

1 SO STIPULATED AND AGREED, August 14, 2023.

2 WEEMS LAW OFFICES

7 */s/Robert C. Weems*

8 ROBERT C. WEEMS,
Attorney for Plaintiff

PHILLIP A. TALBERT,
United States Attorney
MATHEW W. PILE,
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By: */s/ Oscar Gonzalez de Llano*

OSCAR GONZALEZ DE LLANO
Sp. Asst. U.S. Attorney,
Attorney for Defendant
(per email authorization)

11 [PROPOSED] ORDER

12 SO ORDERED

13 DATED: August 16, 2023

14 
15 ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE